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*Attorneys for Defendant Capital One, N.A.,
erroneously sued as "Capital One Financial Corporation"*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIEKA BROWN,

Plaintiff,

v.

TRANS UNION, LLC; EXPERIAN
INFORMATION SOLUTIONS, INC.;
NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; INNOVIS
DATA SOLUTIONS, INC.; CLARITY
SERVICES, INC.; CAPITAL ONE
FINANCIAL CORPORATION; SYNOVUS
BANK DBA FIRST PROGRESS AND
SANTANDER CONSUMER USA INC.,

Defendants.

CASE NO.: 2:25-CV-00013-JCM-DJA

JOINT MOTION

~~STIPULATION~~ AND ORDER TO EXTEND
TIME FOR DEFENDANT CAPITAL ONE,
N.A. TO FILE RESPONSIVE PLEADING
TO COMPLAINT

(FIRST REQUEST)

Pursuant to Local Rules 6-1 and 6-2, Plaintiff Tieka Brown ("Plaintiff") and Defendant Capital One, N.A., erroneously sued as "Capital One Financial Corporation" ("Capital One" and together with Plaintiff, the "Parties") stipulate and agree as follows:

WHEREAS:

1. On or about January 16, 2025, Capital One was served with the Summons and Complaint for the above-referenced matter;
2. On January 22, 2025, counsel for Capital One reached out to Plaintiff's counsel to gather further information regarding Plaintiff's claims and explore the potential for an early

1 resolution;

2 3. On January 31, 2025, the Parties agreed that good cause exists to extend Capital
3 One's responsive pleading deadline to allow the parties to continue to devote resources to
4 exploring the potential for early resolution of this matter;

5 4. The Parties agree to extend the deadline for Capital One to file its responsive
6 pleading to the Complaint to February 20, 2025;

7 5. This stipulation is made in good faith and not for the purpose of delay; and

8 6. This is the first stipulated request to extend Capital One's responsive pleading
9 deadline.

10 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

11 Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended.
12 Capital One shall file its responsive pleading on or before February 20, 2025.

13
14 DATED this 3rd day of February, 2025.

DATED this 3rd day of February, 2025.

15 McDONALD CARANO LLP

FREEDOM LAW FIRM, LLC

16
17 By: /s/ Karyna M. Armstrong
18 Aaron D. Shipley (NSBN 8258)
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20 *Attorneys for Defendant Capital One,*
21 *N.A., erroneously sued as "Capital One*
Financial Corporation"

Attorneys for Plaintiff Tieka Brown

22 **ORDER**

23 Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their
24 attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a
joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the
joint motion (ECF No. 11).

25 
26 DANIEL J. ALIREGTS
UNITED STATES MAGISTRATE JUDGE

27 DATED: 2/4/2025
28